

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

**PLAINTIFF BETTE JEAN MCDONALD'S SUPPLEMENTAL PRETRIAL
STATEMENT SUBMISSION LISTING FOUR ADDITIONAL DEPOSITION
DESIGNATIONS**

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Dated: June 29, 2012

On June 22, 2012, and June 25, 2012, Plaintiff Bette Jean McDonald, pursuant to Local Rule of Civil Procedure 16(e) (the “Rules”) and the Honorable Jonathan W. Feldman’s Pretrial Order (the “PTO”), filed a Pretrial Statement. She is hereby supplementing the Pretrial Statement. Specifically, the Plaintiff is supplementing her disclosure pursuant to PTO § II.I.B.5 and Rule 16(e)(2)(g) for deposition testimony that she intends to offer at trial. Specifically, the Plaintiff is supplying four additional designations for Corilynn’s Lorenzo’s June 20, 2012 deposition.

As noted in Plaintiff’s June 25, 2012 submission, the Plaintiff had received the transcript of Ms. Lorenzo’s deposition only on June 23, 2012 and supplied the list of designations on June 25, 2012 so to provide defense counsel with as much lead notice as possible. The Plaintiff, however, respectfully requested that she be allowed to supplement the listing in case she inadvertently omitted certain testimony that the Plaintiff wished to offer in evidence. The Plaintiff later determined that four such designations were indeed inadvertently omitted. They were provided to the Defendant on June 26, 2012 are listed in bold in the chart below, which now provides a full listing of designations for Ms. Lorenzo.

Deponent Name and Title at Time of Deposition	Transcript Date	Plaintiff’s Designation
Corilynn Lorenzo	Deposed on June 20, 2012	1:1-1:25; 5:1-5:14; 8:7-8:11; 9:2-11:5; 12:3-12:25; 13:8-14:10; 14:16-20:14; 20:21-21:23; 23:11-24:9; 24:10-26:25; 27:1-28:2; 28:9-30:17;

Deponent Name and Title at Time of Deposition	Transcript Date	Plaintiff's Designation
Corilynn Lorenzo	Deposed on June 20, 2012	31:4-36:4; 36:5-39:23; 39:25-40:25; 41:10-42:12; 44:19-45:16; 45:19-47:9; 47:19-48:21; 49:11-53:18; 53:19-54:13; 54:16-55:13; 55:15-55:23; 56:12-58:12; 58:14-62:17; 62:21-63:20; 63:22-65:5; 65:19-66:9; 66:12-66:23; 67:4-67:8; 67:18-68:22; 68:25-69:10; 69:11-73:9; 73:11-74:6; 74:7-77:18; 78:4-80:20; 81:3-81:24; 82:1-82:3; 82:6-82:25; 83:4-83:10; 83:13-83:25;
		84:8-86:7; 86:9-88:5; 88:8-88:25; 89:5-91:6; 91:7-92:22; 93:12-93:24; 94:6-94:12; 94:19-96:3; 96:8-98:6; 98:9-99:9; 99:18-100:15; 100:16-109:19; 110:1-111:2; 111:6-118:4;

Deponent Name and Title at Time of Deposition	Transcript Date	Plaintiff's Designation
Corilynn Lorenzo	Deposed on June 20, 2012	124:10-125:3; 125:9-125:12; 125:23-126:4; 130:3-130:10 131:23-132:4 134:14-134:23 136:16-136:23 137:20-138:12; 139:9-140:3; 183:3:183:5.

Dated: New York, NY
June 29, 2012

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2012, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which then electronically notified the following participants in this case:

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